

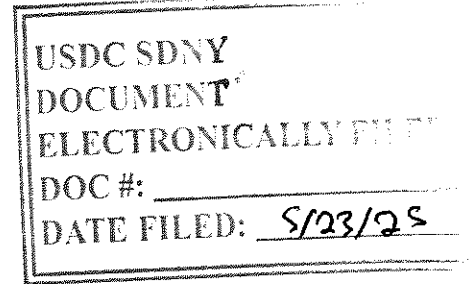
# Rickner PLLC

Stephanie Panousieris | stephanie@ricknerpllc.com

May 23, 2025

**Via ECF**

Hon. Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007



Re: *Ramos v. City of New York, et. al.*, Case No. 23 cv 02464

Your Honor:

My office represents Plaintiff David Ramos in the above-referenced matter, and writes to respectfully request a 30-day extension of time to submit our fee application while the parties work to negotiate costs and fees without the need for motion practice.

Judgment was entered in favor of Plaintiff on May 13, 2025 (Doc. 48). Pursuant to Federal Rule of Civil Procedure 54(d)(2)(B)(i), Plaintiff's attorney's fee application is due within 14 days of entry of judgment, on or before May 27, 2025. The City has requested thirty (30) days to consider our fee demand, and the parties agree that an extension will give us time to negotiate in an attempt to resolve costs and fees without judicial intervention.

We respectfully request a 30-day extension of time, from May 27, 2025 to June 27, 2025, to file a fee application, or otherwise inform the Court that an agreement has been reached between the parties.

We thank the Court for its time and consideration of this request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Stephanie".

Stephanie Panousieris  
*Attorney for Plaintiff*

SO ORDERED

A handwritten signature in black ink, appearing to read "Lewis A. Kaplan".  
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LEWIS A. KAPLAN, USDJ

5/23/25